

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

RUNCIE DOOKERAN, Individually
and On Behalf of All Others Similarly
Situated,

Plaintiff,

v.

XUNLEI LIMITED, LEI CHEN, ERIC ZHOU
and TAO THOMAS WU,

Defendants.

Case No. 1:18-cv-00467-RJS

PENG LI, Individually and On Behalf of
All Others Similarly Situated,

Plaintiff,

v.

XUNLEI LIMITED, LEI CHEN, ERIC ZHOU
and TAO THOMAS WU,

Defendants.

Case No. 1:18-cv-00646-RJS

**MOTION OF HESONG SUN FOR CONSOLIDATION OF THE ACTIONS,
APPOINTMENT AS LEAD PLAINTIFF AND APPROVAL OF SELECTION OF
COUNSEL**

Proposed lead plaintiff Hesong Sun (“Movant”), by his counsel, will hereby move this Court for an Order (attached hereto): (i) consolidating the above-captioned actions; (ii) appointing Movant as Lead Plaintiff; (iii) approving Movant’s selection of the law firm Levi & Korsinsky, LLP to serve as Lead Counsel; and (iv) granting such other and further relief as the Court may deem just and proper. In support of this Motion, Movant submits herewith a Memorandum of Law and the Declaration of Adam M. Apton, dated March 20, 2018.

Dated: March 20, 2018

Respectfully submitted,

LEVI & KORSINSKY, LLP

/s/ Adam M. Apton

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Hesong Sun*